

Message Text

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INFO OCT-01 IO-10 ISO-00 AID-05 EB-07 ACDA-10 CEQ-01

CIAE-00 EPA-04 EUR-12 HEW-06 HUD-02 INR-07 INT-05

L-03 NSAE-00 NSC-05 NSF-02 OIC-02 PA-02 PM-04 PRS-01

SAJ-01 OES-05 SP-02 SS-15 TRSE-00 USIA-15 FEA-01

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FM SECSTATE WASHDC

TO USMISSION GENEVA

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E.O. 11652 N/A

TAGS:ECE, OCON

SUBJECT: ECE - U.S. PROPOSAL FOR AD HOC GROUP

FOR SPRINGER

1. FOLLOWING TEXT WILL BE PRESENTED TO GROUP OF EXPERTS ON
CONSTRUCTION OF VEHICLES BY U.S. REPRESENTATIVE DURING 47TH
SESSION, OCT. 27-31. PLEASE ATTEMPT TO HAVE TEXT TRANSLATED
BY ECE SECRETARIAT BY MID-POINT OF MEETING IF AT ALL
POSSIBLE. QUOTE:

AD HOC GROUP ON CERTIFICATION/COMPLIANCE TEST PROCEDURES
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COMMENT BY THE UNITED STATES

1. AT THE 46TH SESSION OF THE GROUP OF EXPERTS, THE UNITED STATES INFORMALLY PROPOSED THE ESTABLISHMENT OF AN AD HOC GROUP OF RAPORTEURS TO CONSIDER THE QUESTION OF CERTIFICATION/COMPLIANCE TEST PROCEDURES. THE DISCUSSION PRESENTED HERE IS ADDITIONAL BACKGROUND AND SUPPORT FOR THE PROPOSAL.

2. PRESENTLY THERE EXIST FORTY-SIX FEDERAL MOTOR VEHICLE SAFETY STANDARDS (FMVSS) IN THE UNITED STATES AND THIRTY-ONE ECE REGULATIONS, AND THEY ARE STEADILY INCREASING IN NUMBER. IN NO SUBJECT AREA ARE THE STANDARDS AND REGULATIONS COMPLETELY IDENTICAL, HOWEVER THERE ARE CERTAIN AREAS WHICH HAVE GENERALLY SIMILAR REQUIREMENTS AND TEST CONDITIONS. THESE ARE:

ECE REGULATION USA FMVSS

NO. TITLE NO. TITLE

11 STRENGTH OF DOOR 206 DOOR LOCKS AND DOOR
AND HINGES RETENTION COMPONENTS

12 IMPACT PROTECTION 203 IMPACT PROTECTION FOR
FOR THE DRIVER AGAINST THE DRIVER FROM THE
STEERING CONTROL STEERING CONTROL SYSTEM
MECHANISM

204 STEERING CONTROL REAR-
WARD DISPLACEMENT

13 BRAKING 105 HYDRAULIC BRAKE SYSTEMS

121 AIR BRAKE SYSTEMS

14 SAFETY BELT ANCHORAGES 210 SEAT BELT ASSEMBLY
ANCHORAGES

16 SAFETY BELTS FOR 209 SEAT BELT ASSEMBLIES
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ADULTS

17 STRENGTH OF SEATS AND 207 SEATING SYSTEMS
THEIR ANCHORAGES

18 PROTECTION AGAINST 114 THEFT PROTECTION
UNAUTHORIZED VEHICLE
USE

21 INTERIOR FITTINGS 201 OCCUPANT PROTECTION IN
INTERIOR IMPACT

22 PROTECTIVE HELMETS 218 MOTORCYCLE HELMETS
FOR DRIVER AND
PASSENGER OF MOTOR-
CYCLE

25 HEAD RESTRAINTS 202 HEAD RESTRAINTS

26 EXTERNAL PROJECTIONS 211 WHEEL NUTS, WHEEL DISCS,
AND HUB CAPS

27 ADVANCED WARNING 125 WARNING DEVICES
TRIANGLE

30 PNEUMATIC TIRES 109 NEW PNEUMATIC TIRES

IN ADDITION, THERE IS ONE FMVSS (STANDARD NO. 108) WHICH
CAN BE RELATED TO 12 REGULATIONS CONCERNED WITH LAMPS,
REFLECTIVE DEVICES, AND ASSOCIATED EQUIPMENT. THE
REMAINING 31 FMVSS HAVE NO CORRESPONDING ECE REGULATIONS;
LIKEWISE, THERE ARE SIX ECE REGULATIONS WHICH HAVE NO
COUNTERPART IN FMVSS.

3. WITH REGARD TO THE FOREGOING ANALOGOUS CASES, THE
TESTING CONDITIONS ESTABLISHED WITHIN THESE AREAS RANGE
FROM SPECIFIC TO GENERAL. EVEN THOUGH THE TESTING PRO-
VISIONS APPEAR TO BE SIMILAR, THEY DO HAVE MANY TECHNICAL
VARIANCES BOTH IN DEFINITIONS AND IN PROCEDURES. FOR
EXAMPLE, ECE REGULATION NO. 25 REQUIRES USE OF BOTH THE
H-POINT AND THE SEATING REFERENCE POINT WHILE FMVSS NO.
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204 REQUIRES A CRASH TEST. REGULATION NO. 22 HAS DIF-
FERENT TEMPERATURE RANGE SPECIFICATIONS FROM THOSE IN
FMVSS NO. 218 AND USES A WOODEN HEADFORM WHERE FMVSS NO.
218 USES A MAGNESIUM HEADFORM.

4. PRESENTLY, APPROXIMATELY 800,000 VEHICLES ARE IMPORTED
INTO THE U.S. FROM ECE COUNTRIES ANNUALLY. THE DESIGN OF
THESE VEHICLES MUST BE SUCH THAT THEY MEET THE REQUIRE-
MENTS OF THE FMVSS FOR THE VEHICLE EXPORTED TO THE U.S.
AND ALSO MEET THE REQUIREMENTS OF ECE APPROVAL AGREEMENTS.
IT IS APPARENT THAT ANY MOVE TOWARD A STANDARDIZATION OF
TEST PROCEDURES WOULD GREATLY SIMPLIFY THE CERTIFICATION
AND APPROVAL PROGRAMS FOR THESE VEHICLES. THERE ARE FOUR
BASIC RELATIONSHIPS BETWEEN ECE AND U.S. REGULATIONS WHICH
AFFECT THESE VEHICLES. THESE RELATIONSHIPS ARE:

1. NONEXISTENCE OF COMPARABLE REGULATIONS.
2. EXISTENCE OF COMPARABLE REGULATIONS, BUT WITH WIDELY DIFFERENT REQUIREMENTS AND TEST CONDITIONS.
3. EXISTENCE OF COMPARABLE REGULATIONS WHICH HAVE SIMILAR REQUIREMENTS BUT DIFFERENT TEST CONDITIONS.
4. EXISTENCE OF COMPARABLE REGULATIONS WHICH HAVE SIMILAR OR IDENTICAL REQUIREMENTS AND TEST CONDITIONS.

THE AD HOC GROUP SHOULD ADDRESS ITSELF TO THOSE REGULATIONS WHICH ARE IN THE LAST TWO CATEGORIES, THAT IS, THOSE

INSTANCES WHERE THERE IS SIMILARITY OF REQUIREMENTS BUT NOT NECESSARILY SIMILARITY OF TEST CONDITIONS.

5. IN THOSE INSTANCES WHERE THERE IS A SIMILARITY OF REQUIREMENTS BETWEEN REGULATIONS, THE STANDARDIZATION OF TEST CONDITIONS SIMPLIFIES ECE CERTIFICATION OR U.S. COMPLIANCE PROCEDURES FOR IMPORTED VEHICLES. THE CERTIFICATION PROCEDURE REQUIRES A LABORATORY TO EXAMINE THE PERFORMANCE OF SAFETY-RELATED EQUIPMENT. IF THE TESTS RUN BY THIS LABORATORY ARE IDENTICAL TO TESTS LEGALLY REQUIRED

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ELSEWHERE, THE CHANCE OF INADVERTENT NONCERTIFICATION IS MINIMIZED. IN THE CASE OF COMPLIANCE TESTING, A MANUFACTURER IS REQUIRED TO PRODUCE INFORMATION AND DATA WHEN THE GOVERNMENT MAKES AN INITIAL DETERMINATION OF NON-COMPLIANCE. IF THE DATA PROVIDED BY THE MANUFACTURER INCLUDED TESTING RESULTS FROM THE MANUFACTURER'S DOMESTIC CERTIFICATION LABORATORY, FOR IDENTICAL TESTS, THE RESOLUTION OF NONCOMPLIANCE CASES COULD BE GREATLY SIMPLIFIED.

6. IN INSTANCES WHERE THERE ARE SIMILAR BUT NOT TECHNICALLY IDENTICAL REQUIREMENTS IN REGULATIONS, THE TEST TOLERANCES USED IN EITHER CERTIFICATION OR COMPLIANCE MAY BE SUCH THAT THE REQUIRED PERFORMANCE IS IDENTICAL EVEN THOUGH THE REQUIREMENTS ARE NOT. CONSIDERATION OF SUCH SITUATIONS BY THE AD HOC GROUP WOULD PRODUCE RECOMMENDATIONS TO STANDARDS WRITING GROUPS FOR MODIFICATION IN THE TECHNICAL REQUIREMENTS. THE RESULTING NEW REQUIREMENTS WOULD BE IDENTICAL, AND HENCE, HARMONIZED REGULATIONS WOULD BE PRODUCED.

7. FROM THE DEVELOPMENT OF COMMON TEST PROCEDURES, LEVELS

OF PRECISION AND SPECIFIC DETAIL NEEDED FOR ANY TESTING TECHNIQUE COULD ALSO BE DEVELOPED. SPECIFICATIONS FOR CALIBRATION ACCURACY OF INSTRUMENTATION DELINEATED IN THE TEST PROCEDURES, AND RECOMMENDATIONS OF ACCEPTABLE TOLERANCES FOR THE READINGS RECORDED DURING THE TESTING COULD ALSO EVOLVE FROM THIS WORK.

8. IT IS ENTIRELY APPROPRIATE AND NECESSARY THAT DISCUSSIONS OF THIS NATURE TAKE PLACE UNDER THE AUSPICES OF A GOVERNMENTAL GROUP. THIS IS DUE TO THE LEGAL NATURE OF THE TEST PROCEDURES WHICH ARE INCLUDED IN SAFETY STANDARDS. IT IS OUR HOPE THAT THIS AD HOC GROUP WILL REQUEST AND RECEIVE PARTICIPATION AND ASSISTANCE FROM NONGOVERNMENTAL GROUPS SUCH AS ISO, SAE, AND BPICA. IN PARTICULAR, THE AD HOC GROUP SHOULD SOLICIT EXAMPLES WHEREIN MANUFACTURERS MUST PRODUCE DIFFERENT DESIGNS TO MEET THE REQUIREMENTS OF SIMILAR U.S. AND ECE REGULATIONS. UNQUOTE INGERSOLL

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